

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1337 (***)

AUDIOVOX COMMUNICATIONS CORP.,
AUDIOVOX ELECTRONICS CORP., NIKON
CORPORATION, NIKON INC., NOKIA
CORPORATION, NOKIA INC., SANYO
ELECTRIC CO., LTD., and SANYO NORTH
AMERICA,

Defendants.

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1338 (***)

APPLE COMPUTER, INC.; ARGUS a/k/a
HARTFORD COMPUTER GROUP, INC.;
CASIO COMPUTER CO., LTD.; CASIO, INC.;
CONCORD CAMERAS; DELL
INC.; EASTMAN KODAK COMPANY; FUJI
PHOTO FILM CO., LTD.; FUJI PHOTO FILM
U.S.A., INC.; FUJITSU LIMITED; FUJITSU
AMERICA, INC.; FUJITSU COMPUTER
PRODUCTS OF AMERICA, INC.; KYOCERA
WIRELESS CORP.; MATSUSHITA
ELECTRICAL INDUSTRIAL CO.;
MATSUSHITA ELECTRICAL
CORPORATION OF AMERICA; NAVMAN
NZ LIMITED; NAVMAN U.S.A. INC.;
OLYMPUS CORPORATION; OLYMPUS
AMERICA, INC.; PENTAX CORPORATION;
PENTAX U.S.A., INC.; SONY
CORPORATION, SONY CORPORATION OF
AMERICA; SONY ERICSSON MOBILE

COMMUNICATIONS AB; SONY ERICSSON
MOBILE COMMUNICATIONS (USA) INC.;
TOSHIBA CORPORATION; and TOSHIBA
AMERICA, INC.

Defendants.

HONEYWELL INTERNATIONAL INC., AND
HONEYWELL INTELLECTUAL
PROPERTIES INC.,

Plaintiff,

vs.

CITIZEN WATCH CO., LTD. AND CITIZEN
DISPLAYS CO., LTD.,

Defendants.

Case No. 1:05 CV 00874 ***

**DECLARATION OF AKIHIRO TAKEUCHI IN SUPPORT OF DEFENDANTS
CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.'S
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, AKIHIRO TAKEUCHI, hereby state as follows:

1. I make this Declaration based on personal knowledge, I am over the age of 18,
and I am competent to testify to the matters set forth herein.
2. I am an employee of Citizen Displays Co., Ltd.
3. Prior to December 12, 2005, I had inquired of Masayuki Arai, of Taiwan
International Procurement Office of Panasonic Industrial Sales Taiwan Co., Ltd. ("Mr. Arai"),
whether any X300 Panasonic handsets with LCD modules supplied by Citizen were ever sold in
the North American market.

4. Mr. Arai responded to my inquiry on December 12, 2005, and wrote that no such sales occurred in North America.

5. On December 15, 2005, Mr. Arai informed me via email that he had inquired again regarding whether any such sales occurred in North America, and he found that 1,000 of the X300 handsets were shipped in December, 2004.

6. Mr. Arai's email of December 15, 2005 was the first notice I received from Panasonic that any of the X300 handsets entered North America.

7. Upon information and belief, this was the first notice that any employee at Citizen Watch Co., Ltd. or Citizen Displays Co., Ltd. had that any of the X300 handsets had entered North America.

8. Attached hereto as Exhibit A is a true and correct copy of email correspondence between myself and Mr. Arai between December 12, 2005 and December 15, 2005, referenced above.

9. Attached hereto as Exhibit B is a true and correct copy of an email I received from Morris Yu of Quanta Computer on October 21, 2004, requesting a stop to all assembly production of Citizen's K1122H-HL modules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Tokyo, Japan, this 13th day of December, 2007.

竹内 昭洋
Akihiro Takeuchi